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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHARLIE LLOYD III, }
Plaintiff, }
v. }
MICHAEL J. ASTRUE, }
Commissioner of Social Security }
Defendant. }

CASE NO. 3:11-cv-4902-EMC
STIPULATION AND ~~PROPOSED~~ ORDER
FOR FIRST EXTENSION OF TIME TO
FILE DEFENDANT'S CROSS-MOTION

The parties hereby stipulate through counsel, with the Court's approval as indicated by issuance of the attached Order, that Defendant shall have a first extension of time of 30 days to file his cross-motion for summary judgment.

The extension is being sought due to defendant's counsel's workload during the past month coupled with the Social Security Regional Counsel's move to new office space at the end of March 2012—with all the associated preparations, organization, meetings, packing, and unpacking—which have taken more of counsel's time than projected. Defendant's counsel was responsible for moving her own office as well as helping to pack and move common office areas such as the fax and mail center, file areas, and unoccupied cubicles. In addition, after the move, unpacking and technological

1 setup/troubleshooting of computer equipment has required additional unanticipated time and IT
2 assistance before counsel's office has become fully functional.

3 Given these constraints, along with counsel's existing workload, the Commissioner respectfully
4 requests 30 additional days in which to complete the Commissioner's cross-motion. The new due date
5 will be May 30, 2012.

6 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

7 Respectfully submitted,

8 Dated: April 30, 2012

/s/ Robert C. Weems
(As authorized via e-mail)
ROBERT C. WEEMS
Attorney for Plaintiff

11 Dated: April 30, 2012

MELINDA L. HAAG
United States Attorney

17 IT IS SO ORDERED:

19 Dated: 4/30/12

